PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298

August 31, 2012



Advice Letter 4353 Advice Letter 4353-A

Rasha Prince, Director Regulatory Affairs Southern California Gas 555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011

Subject: Revisions to Rule No. 41, Utility System Operation – Request for Additional System Operator Tool

Dear Ms. Prince:

Advice Letter 4353 and 4353-A are effective July 12, 2012.

Sincerely,

Edward Randoph

Edward F. Randolph, Director Energy Division



Rasha Prince Director Regulatory Affairs

555 W. Fifth Street, GT14D6 Los Angeles, CA 90013-1011 Tel: 213.244.2009 Fax: 213.244.3201 rprince@semprautilities.com

July 20, 2012

Advice No. 4353-A (U 904 G)

Public Utilities Commission of the State of California

<u>Subject</u>: Partial Supplement - Revisions to Rule No. 41, Utility System Operation -Request for Additional System Operator Tool

Southern California Gas Company (SoCalGas) hereby submits for approval by the California Public Utilities Commission (Commission) a revision to its Rule No. 41, Utility System Operation, as shown on Attachment B.

Purpose

This complies with Ordering Paragraph (OP) 2 of Resolution G-3474 adopted on July 12, 2012 which approves SoCalGas' Advice No. (AL) 4353, with one modification. OP 2 ordered that SoCalGas' proposed revision to Number 15, <u>Purchases and Sales to Manage Minimum Flow</u> <u>Supplies</u> of its Rule No. 41 be modified as further discussed below.

Background

On March 30, 2012, SoCalGas filed AL 4353 requesting approval of an additional tool allowing the System Operator to move supply from Blythe, California to Otay Mesa, California in order to maintain required minimum flows on its Southern System. On July 12, 2012, the Commission adopted Resolution G-3474 which approves AL 4353, subject to one modification to SoCalGas' proposed revision to Number 15, <u>Purchases and Sales Management Minimum Flow Supplies</u> of SoCalGas' Rule No. 41.

Requested Tariff Changes

As ordered in OP 2 of Resolution G-3474, Number 15, <u>Purchases and Sales to Manage</u> <u>Minimum Flow Supplies</u> of SoCalGas' Rule No. 41 is modified to include in item (2), after the words "flow date," the following:

"and the movement fills some or all of the shortfall between supplies needed at Otay Mesa and supplies available for purchase at Otay Mesa."

Protest

Anyone may protest this Advice Letter to the Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and received within 20 days of the date of this Advice Letter, which is August 9, 2012. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC - Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division Tariff Unit (<u>EDTariffUnit@cpuc.ca.gov</u>). A copy of the protest should also be sent via both e-mail <u>and</u> facsimile to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Sid Newsom Tariff Manager - GT14D6 555 West Fifth Street Los Angeles, CA 90013-1011 Facsimile No. (213) 244-4957 E-Mail: snewsom@semprautilities.com

Effective Date

SoCalGas believes that this filing is subject to Energy Division disposition and because it fully complies with Resolution G-3474 should be classified as Tier 1 (effective pending approval). SoCalGas respectfully requests that the tariff sheets filed herein be made effective July 12, 2012, the effective date of the resolution.

<u>Notice</u>

A copy of this advice letter is being sent to the parties listed on Attachment A, which includes parties in the Omnibus proceeding, A.06-08-026, and FAR Update proceeding, A.10-03-028.

Rasha Prince Director Regulatory Affairs

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY

ENERGY UTILITY					
MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)					
Company name/CPUC Utility No. SOUTHERN CALIFORNIA GAS COMPANY (U 904G)					
Utility type:	Contact Person: <u>Sid Newsom</u>				
\Box ELC \boxtimes GAS	Phone #: (213) <u>24</u>	4-2846			
PLC HEAT WATER	E-mail: SNewsom@semprautilities.com				
EXPLANATION OF UTILITY TY	PE	(Date Filed/ Received Stamp by CPUC)			
ELC = ElectricGAS = GasPLC = PipelineHEAT = HeatWATER = Water					
Advice Letter (AL) #: <u>4353-A</u>					
Subject of AL: <u>Partial Supplement: Revision of Rule No. 41 and Request for Additional System</u> Operator Tools					
Keywords (choose from CPUC listing)	: Rules				
AL filing type: Monthly Quarter		Dne-Time 🗌 Other			
If AL filed in compliance with a Com	°				
<u>G-3474</u>					
	rted AL2 If so idea	ntify the prior AL <u>No</u>			
Summarize differences between the A		· ·			
Summarize unreferees between the r	in and the prior w	indiawn of rejected AL . <u>IV A</u>			
Does AL request confidential treatment? If so, provide explanation: No					
Resolution Required? Yes No		Tier Designation: 🛛 1 🗌 2 🔲 3			
Requested effective date: 7/12/12		No. of tariff sheets: <u>3</u>			
Estimated system annual revenue ef	fect: (%): <u>N/A</u>				
Estimated system average rate effect	(%): <u>N/A</u>				
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).					
Tariff schedules affected: <u>Rules. TOO</u>	Cs				
Service affected and changes proposed ¹ : N/A					
Pending advice letters that revise the same tariff sheets: <u>None</u>					
Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:					
CPUC, Energy Division		Southern California Gas Company			
Attention: Tariff Unit		Attention: Sid Newsom			
505 Van Ness Ave., San Francisco, CA 94102		555 West 5 th Street, GT14D6 Los Angeles, CA 90013-1011			
EDTariffUnit@cpuc.ca.gov		SNewsom@semprautilities.com			
		ariffs@socalgas.com			

 $^{^{\}rm 1}$ Discuss in AL if more space is needed.

ATTACHMENT A

Advice No. 4353-A

(See Attached Service Lists)

ATTACHMENT B Advice No. 4353-A

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Revised 48308-G	Rule No. 41, UTILITY SYSTEM OPERATION, Sheet 6	Revised 48079-G Original 45404-G
Revised 48309-G	TABLE OF CONTENTS	Revised 47212-G* Revised 48082-G
Revised 48310-G	TABLE OF CONTENTS	Revised 48307-G

SOUTHERN CALIFORNIA GAS COMPANY

LOS ANGELES, CALIFORNIA CANCELING

Revised CAL. P.U.C. SHEET NO. 48308-G Revised CAL. P.U.C. SHEET NO. 48079-G Original 45404-G

Rule No. 41 <u>UTILITY SYSTEM OPERATION</u>

Sheet 6

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(Continued)

PURCHASES AND SALES TO MANAGE MINIMUM FLOW SUPPLIES (Continued)

- 14. Purchases or sales at prices that are outside the ranges specified in Section 13 (a) and (b) above shall nevertheless be deemed reasonable if the Operational Hub abides by the following procedure: When the Gas Control Department determines that spot purchases are necessary to meet minimum flow requirements, the Operational Hub shall monitor ICE and record the relevant price information, if available, for deliveries of gas at all relevant trading points. If volumes available on ICE meet or exceed the minimum flow requirements, transactions for the volumes offered through ICE shall be deemed reasonable. The Operational Hub may also post an offer/bid on ICE for volumes. When less than the required volumes are available on ICE, the Operational Hub shall contact gas suppliers (other than the Utility Gas Procurement Department or affiliates), request offers for the necessary supplies, and record their offers for gas delivered to the relevant trading points to ensure at least three offers from three different suppliers are available for comparison. The Operational Hub shall compare prices posted on ICE and, if applicable, prices quoted by its supplier contacts, and select the best prices available to meet the quantities required to meet minimum flow requirements. Verification that the Operational Hub has followed this procedure shall be provided to the CPUC in the Annual Compliance Report described in Section 24 below.
- 15. When the Gas Control Department determines that deliveries at Otay Mesa are necessary to meet minimum flow requirements, such requirements may be satisfied either through spot purchases at Otay Mesa or through the movement of supplies from Blythe to Otay Mesa. Standards and criteria for spot purchases are set forth above. Should it be necessary for the Operational Hub to move supplies from Blythe to Otay Mesa, the movement shall be deemed to be reasonable if (1) the cost of moving the supplies is less than or equal to the difference between the ICE Wtd Avg Index for the Blythe and the cost of spot gas available for purchase at Otay Mesa for the relevant flow date, or (2) if sufficient spot supplies are not available for purchase at Otay Mesa for the relevant flow date, and the movement fills some or all of the shortfall between supplies needed at Otay Mesa and supplies available for purchase at Otay Mesa.
- 16. Purchases and sales other than those described in Sections 14 and 15 above will not be deemed unreasonable but shall be subject to review and any requests for explanation by the CPUC Energy Division in conjunction with the Annual Compliance Report described in Section 24 below.
- 17. Standards, criteria and procedures set forth in Sections 13, 14, 15 and 16 apply to Operational Hub's purchases and sales as of April 1, 2009.
- 18. The Utility shall seek CPUC authority for any additional tools (other than system modifications that can be completed without an application under current rules) necessary to meet the Southern System minimum flow requirement through an application. Any contracts that are not obtained through an RFO process relating to already-approved tools (i.e., gas purchases, gas exchanges) will be submitted to the CPUC for approval by Advice Letter. Advice Letters seeking approval of the Operational Hub contractual arrangements shall identify the order in which contracts will be implemented to ensure system reliability and integrity at least cost.

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The following listed sheets contain all effective Schedules of Rates and Rules affecting service and information relating thereto in effect on the date indicated thereon.

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(TO BE INSERTED BY UTILITY) ADVICE LETTER NO. 4353-A DECISION NO. 1H7 (Continued)

ISSUED BY Lee Schavrien Senior Vice President (TO BE INSERTED BY CAL. PUC) DATE FILED Jul 20, 2012 EFFECTIVE Jul 12, 2012 RESOLUTION NO. G-3474